

## **REMARKS**

In response to the above-identified Office Action, Applicants amend the application and seek reconsideration thereof. Specifically, Claims 1, 2, 8 and 12 are amended, and new Claims 16-30, which are supported by the original disclosure, are added. Thus, Claims 1-30 are pending in the application.

### **I. Claims Rejected Under 35 U.S.C. § 112, Second and Fourth Paragraphs**

Claims 1 and 2 are rejected under 35 U.S.C. § 112. As to Claim 1, the Examiner noted an insufficient antecedent basis for two limitations in the Claim. Applicants have amended Claim 1 to correct these deficiencies. As to Claim 2, that Claim suffered from a similar deficiency as Claim 1, and further failed to provide additional limitation over the Claim it depended upon, Claim 1. Applicants' amendments are believed to correct these deficiencies. For these reasons, Applicants respectfully request that the Examiner withdraw the rejections based upon 35 U.S.C. § 112, second and fourth paragraphs.

### **II. Claims Rejected Under 35 U.S.C. § 102(b)**

Claim 1 is rejected under 35 U.S.C. § 102(b) as anticipated by Coulouris, *Distributed Systems Concepts and Designs* ("Coulouris"). To the extent that this rejection applies to Claim 1 as currently amended, Applicants respectfully disagree that *Coulouris* anticipates the Claim.

To anticipate a claim, the reference relied upon must disclose every limitation of the claim. Here, Claim 1 recites a method comprising maintaining a first page table map for use in an isolated execution mode and a second page table map for use in a normal execution mode; dynamically swapping between the first page table map and the second page table map responsive to a change in execution mode; identifying if an event is one of a class of events to be handled in the isolated execution mode; and

handling the event using the first page table map if the event is identified as one of the class of events to be handled in the isolated execution mode.

*Coulouris* discusses computer operating systems at a different level of abstraction than that disclosed and claimed in the instant application, which makes meaningful comparisons difficult, but Applicants offer several observations in reference to the Examiner's comments. First, as to the likening of an "isolated execution mode" to a "processor running a secure process," the cited portion of *Coulouris* does not discuss a processor running a secure process, nor is it readily apparent from the surrounding material what such a processor might be, or how it is like the claimed isolated execution mode. Second, although *Coulouris* discusses software interrupts at p. 172, it is in the context of comparing thread context switches with process context switches. *Coulouris* does not disclose identifying if an event is one of a class of events to be handled in the isolated execution mode, nor handling the event using the first page table map if the event is identified as one of the class of events to be handled in the isolated execution mode.

For at least these reasons, Applicants respectfully submit that Claim 1, as amended, is not anticipated by *Coulouris*. Accordingly, the Examiner is requested to withdraw this rejection.

### **III. Claims Rejected under 35 U.S.C. § 103(a)**

With respect to the remaining claims considered in the Office Action, namely Claims 3-15, Applicants observe that Claims 3-8 depend directly or indirectly upon Claim 1, which has been shown to be patentable over *Coulouris* in the discussion above. For at least the reasons mentioned, Claims 3-8 are also patentable, and Applicants request that the rejections of these Claims be withdrawn. Applicants note that the Examiner repeatedly relies on official notice, while Applicants take issue with this

reliance, only the official notice directed to the independent claims has been addressed herein. This is not a waiver of Applicants' right to object to the application of official notice in any future response.

As to independent Claim 9, that Claim is rejected under 35 U.S.C. § 103(a) "for the same reasons as Claim 5," or in other words, because the Examiner takes official notice that mirroring page table base address registers and memory maps was well known at the time of invention. However, Claim 5 is a method claim, while Claim 9 is drawn to an apparatus with a first storage location, a second storage location, and a selection unit. Applicants take issue with the Examiner's official notice and requests the Examiner provide a reference for mirroring of a page table base address register. Applicants particularly point out that mirroring the register is not mirroring the data. Mirroring the register implies a copy of the register itself. While this observation is really only salient to Claim 5, as Claim 9 explicitly claims plural storage locations for control data for plural page table maps. The Examiner is obligated to provide a reference teaching or suggesting the existence of plural storage locations that store control data for different page table maps in a single apparatus. Absent such a reference, no *prima facie* case of obviousness exists. For at least this reason, Applicants request that the rejections of Claim 9 and its dependent claims, Claims 10 and 11, be withdrawn.

As to independent Claim 12, that Claim is rejected under 35 U.S.C. § 103(a) "for the same reasons as Claim 3," or in other words, because "loading a set of control registers based on an exception vector of an event was well known at the time of invention." Again the Examiner relies on official notice "that loading a set of control registers based on an exception vector of an event was well known at the time of the invention." Even if true, this does not carry the day, because the Examiner is not

entitled from this fact to conclude that one of ordinary skill would provide a mapping unit to dynamically load the registers to change a memory map of the system. Again, the Examiner is requested to provide an explicit reference for the elements Applicants claim. Absent a reference, the Examiner has failed to set forth a *prima facie* case of obviousness. For at least this reason, Applicants respectfully submit that the rejection of Claim 12 is improper and should be withdrawn.

Finally, as to Claims 13-15, those Claims depend directly or indirectly upon Claim 12, which seems to have been improperly rejected. Applicants request that Claims 13-15 be allowed.

### CONCLUSION


In view of the foregoing, it is believed that all Claims now pending, namely Claims 1-30, patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800.

Dated: September 3, 2004

Respectfully submitted,

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| <p>12400 Wilshire Boulevard<br/>Seventh Floor<br/>Los Angeles, California 90025<br/><br/>(310) 207-3800</p> | <p><u>CERTIFICATE OF MAILING</u><br/>I hereby certify that the correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on September 3, 2004.</p> <p>      9/3/2004<br/>_____<br/>Susan M. Barrette      Date</p> |
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